

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TZEW HOLDCO LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10910 (CSS)

(Jointly Administered)

Hearing date: Feb. 3, 2021 at 11:00 a.m. (ET)

Obj. deadline: Jan. 27, 2021 at 4:00 p.m. (ET)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Protective Life Insurance Company (“Protective”), by and through its undersigned counsel, has filed the **Motion of Protective Life Insurance Company for Authorization to Exercise Recoupment Rights Or, In The Alternative, For Relief From The Automatic Stay to Exercise Setoff Rights** (the “Motion”).

PLEASE TAKE FURTHER NOTICE that any objection to the Motion must be made in writing and filed on or before January 27, 2021 at 4:00 p.m. (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must also serve a copy of the response upon the counsel to Protective listed below so that the response is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed, a hearing on the Motion will be held on February 3, 2021 at 11:00 a.m. (ET) before the Honorable Christopher S.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PP Group, LLC (5579); PP Property Holdings, LLC (1013); PP Parks Beverage Company, LLC (2339); PP Parks Holdings, LLC (7913); PP Parks Management, LLC (2937); TZEW Holdco LLC (0252); and TZEW Intermediate Corp. (1058). The location of the Debtors’ service address in these chapter 11 cases is: c/o Paladin Management, 633 W. 5th Street, 28th Floor, Los Angeles, CA 90071.

Sontchi, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that if no objection is filed timely and in accordance with the procedures set forth above, the Bankruptcy Court may enter an order without further notice or hearing.

Dated: January 19, 2021  
Wilmington, Delaware

Respectfully submitted,

/s/ Cory D. Kandestin  
Cory D. Kandestin (No. 5025)  
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